

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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HENRIETTA KLEIN, derivatively on  
behalf of PFIZER INC.,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S.  
BROWN, M. ANTHONY BURNS,  
ROBERT N. BURT, W. DON  
CORNWELL, WILLIAM H. GRAY III,  
CONSTANCE J. HORNER, JAMES M.  
KILTS, JEFFREY B. KINDLER,  
GEORGE A. LORCH, DANA G. MEAD,  
SUZANNE NORA JOHNSON, STEPHEN  
W. SANGER, WILLIAM C. STEERE, JR.,  
FREDA C. LEWIS-HALL, FRANK  
D'AMELIO, and IAN READ,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

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Civil Action No. 09-cv-7822(JSR)

**NOTICE OF PLAINTIFF KLEIN'S MOTION TO  
CONSOLIDATE ACTIONS, APPOINT LEAD PLAINTIFF,  
LEAD COUNSEL AND LIASON COUNSEL**

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JAMES KENNEY, Derivatively on Behalf  
of PFIZER INC.,

Plaintiff,

v.

JEFFREY B. KINDLER, DOUGLAS M.  
LANKLER, DENNIS A. AUSIELLO,  
MICHAEL S. BROWN, ROBERT N.  
BURT, W. DON CORNWELL,  
CONSTANCE J. HORNER, JAMES M.  
KILTS, DANA G. MEAD, SUZANNE  
NORA JOHNSON, HENRY A.  
MCKINNELL, DAVID L. SHEDLARZ,  
WILLIAM R. HOWELL, STANLEY O.  
IKENBERRY, FRANKLIN D. RAINES,  
RUTH J. SIMMONS, AND JEAN-PAUL  
VALLES

Defendants,

and

PFIZER INC.,

Nominal Defendant.

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Civil Action No. 09-cv-7913(JSR)

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ROBERT J. CASEY and WILLIAM A.  
HOUSTON Derivatively on Behalf of  
PFIZER INC.,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S.  
BROWN, ANTHONY M. BURNS,  
ROBERT N. BURT, DON W.  
CORNWELL, WILLIAM H. GRAY, III,  
CONSTANCE J. HORNER, JAMES M.  
KILTS, JEFFREY B. KINDLER,  
GEORGE A. LORCH, DANA G. MEAD,  
SUZANNE NORA JOHNSON, STEPHEN  
W. SANGER, WILLIAM C. STEERE, JR.,  
FREDA C. LEWIS-HALL, FRANK  
D'AMELIO, and IAN READ,

Defendants,

and

PFIZER INC.,

Nominal Defendant.

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Civil Action No. 09-cv-7983(JSR)

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LOUISIANA SHERIFFS' PENSION AND  
RELIEF FUND, Derivatively on Behalf of  
PFIZER INC.,

Plaintiff,

v.

DENNIS A. AUSIELLO; MICHAEL S.  
BROWN; M. ANTHONY BURNS;  
ROBERT N. BURT; W. DON  
CORNWELL; WILLIAM H. GRAY III;  
CONSTANCE J. HORNER; JAMES M.  
KILTS; JEFFREY B. KINDLER;  
GEORGE A. LORCH; DANA G. MEAD;  
SUZANNE NORA JOHNSON; WILLIAM  
C. STEERE, JR.; DOUGLAS M.  
LANKLER; FRANK A. D'AMELIO; IAN  
C. READ; and JOSEPH M. FECZKO

Defendants,

and

PFIZER INC.,

Nominal Defendant.

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Civil Action No. 09-cv-8042(JSR)



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AMALGAMATED BANK, AS TRUSTEE  
FOR LONGVIEW LARGE CAP 500  
INDEX VEBA FUND, LONGVIEW  
LARGE CAP 500 INDEX FUND and  
LONGVIEW QUANTITATIVE  
LARGE CAP FUND, derivatively, on  
behalf of PFIZER INC.,

Plaintiff,

v.

DENNIS A. AUSIELLO, MICHAEL S.  
BROWN, M. ANTHONY BURNS,  
ROBERT N. BURT, W. DON  
CORNWELL, WILLIAM H. GRAY III,  
CONSTANCE J. HORNER, JAMES M.  
KILTS, JEFFREY B. KINDLER,  
GEORGE A. LORCH, DANA G. MEAD,  
SUZANNE NORA JOHNSON, WILLIAM  
C. STEERE, JR., WILLIAM R. HOWELL,  
HENRY A. MCKINNELL, STANLEY O.  
IKENBERRY, RUTH J. SIMMONS,  
DOUGLAS M. LANKLER, FRANK A.  
D'AMELIO, IAN C. READ, and JOSEPH  
M. FECZKO

Defendants,

and

PFIZER INC.,

Nominal Defendant.

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Civil Action No. 09-cv-8363(JSR)

PLEASE TAKE NOTICE THAT, on a date and time convenient to the Court subsequent to the submission hereof, before the Honorable Jed S. Rakoff of this Court, in Courtroom 14B located at the Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl Street, New York, New York, Plaintiff Henrietta Klein (“Klein” or “Plaintiff”) by her counsel, will hereby move the Court to issue an order: (i) consolidating the above-captioned actions and any subsequently filed actions that involve questions of law or fact substantially similar to those contained in the pending actions; (ii) appointing plaintiff Klein as Lead Plaintiff; (iii) appointing The Weiser Law Firm, P.C. as Lead Counsel for Plaintiffs; and (iv) appointing the Law Offices of Curtis V. Trinko, LLP as Liaison Counsel for Plaintiffs. Filing and service of the papers initiating this Motion are due on October 8, 2009, response papers are due on October 13, 2009, and reply papers are due on October 15, 2009.

The motion is based upon this Notice, the Memorandum of In Support of Motion submitted herewith, as well as the annexed Declarations of Robert B. Weiser and Henrietta Klein.

Dated: October 8, 2009

Respectfully submitted,

s/ Curtis V. Trinko

**LAW OFFICES OF CURTIS V. TRINKO, LLP**

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[Proposed] Liaison Counsel for Plaintiffs and  
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[Proposed] Lead Counsel for Plaintiffs and counsel  
for plaintiff Henrietta Klein